

EXHIBIT 3

Whisler, Megan

From: Godesky, Leah
Sent: Thursday, September 8, 2022 3:46 PM
To: Andrew Stephens; Lollar, Tirzah; Martin, Meghan C.; Raymond Winter
Cc: Eugenia Krieg; Drew Wright; Sindy Chandy; Christopher Hilton; Amy Hilton; Benjamin Walton; Heather Hacker; Sheehan, Christian; Odell, Christopher M.; Margolis, Craig D.; brown@blackburnbrownlaw.com; Chapa, Justin R.; Michael Moore; Ashby, Danny S.; Weberman, Melissa L.; Bloom, Craig P.
Subject: United States of America et al v. Planned Parenthood Federation of America Inc et al (Case 2:21-cv-00022-Z)

Counsel, we write to inform Plaintiffs that PPFA is utilizing a technology assisted review ("TAR") tool to produce documents to Plaintiffs tomorrow. After the Court's August 25, 2022 order on Relator's motion to compel, PPFA immediately began collecting documents, with more than 275k documents initially collected and processed. To meet the Court's September 9, 2022 production deadline, PPFA utilized a combination of individual-document review, and a TAR/Continuous Active Learning review using Brainspace as the tool. Both diversity and stratified samples, totaling thousands of documents, were used to train the model. We assessed model stability using statistically drawn Control Set and Validation samples and established a cut-off score. All documents above the cut-off score and their respective families will be screened for privilege and confidentiality before production.

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